

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

VERGEOUS GOULD,

Defendant.

) I N D I C T M E N T

) JUDGE

) CASE NO. 5 : 19 CR 720 -1
Title 21, United States Code,
Sections 841(a)(1),(b)(1)(C)
and 843(b)

JUDGE GAUGHAN

COUNT 1

(Distribution of a Controlled Substance, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury charges:

1. On or about September 13, 2019, in the Northern District of Ohio, Eastern Division, Defendant VERGEOUS GOULD did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

ENHANCED PENALTY UNDER TITLE 21,
UNITED STATES CODE, SECTION 841(b)(1)(C)

(Death or Serious Bodily Injury Resulting from Use of Controlled Substance,
21 U.S.C. § (b)(1)(C))

2. The allegations of Count 1 are hereby re-alleged and incorporated herein. On or about September 13, 2019, in the Northern District of Ohio, IND-1, a person whose identity is known to the Grand Jury, did fatally ingest and overdose on a mixture and substance containing a controlled substance, namely fentanyl, that Defendant distributed to IND-1.

3. As a result of Defendant's distribution of the mixture and substance containing fentanyl, as alleged in Count 1, death did result from the use thereof, in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 2

(Unlawful Use of a Communication Facility, 21 U.S.C. § 843(b))

The Grand Jury further charges:

4. On or about September 13, 2019, in the Northern District of Ohio, Eastern Division, Defendant VERGEOUS GOULD did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 843(b).

COUNT 3

(Possession with Intent to Distribute a Controlled Substance, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

5. On or about September 16, 2019, in the Northern District of Ohio, Eastern Division, Defendant VERGEOUS GOULD did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE

The Grand Jury further charges:

6. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegations of Counts 1 through 3 are incorporated herein by reference. As a result of the foregoing offenses, Defendant VERGEOUS GOULD shall forfeit to the United

States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violations; and, any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

A TRUE BILL.

Original Document—Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.